UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

TRUTEK CORP.,

Plaintiff,

v.

YEONG WAN CHO (a.k.a. PETER CHO, ET AL.,

Defendants.

Civil Action No.: 2:23-cv-3709

Document Electronically Filed

NOTICE OF DEFENDANTS PETER CHO, BIOSURE GLOBAL, LTD., SALVACION USA, INC., AND SALVACION INTERNATIONAL LLC'S CONSOLIDATED MOTION TO DISMISS

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Attorneys for Defendants Salvacion, USA, Inc.; Salvacion Co., LTD.; Yeong Wan Cho (aka Peter Cho); Salvacion R&D Center; Salvacion International, LLC; Sei Young Yun; Biosure Global, Ltd. PLEASE TAKE NOTICE that as soon thereafter as counsel may be heard, Defendants Peter Cho, BioSure Global, Ltd. Salvacion, USA, Inc., and Salvacion International, LLC, (the "moving Defendants") by and through his counsel, shall move to dismiss certain claims in Plaintiff Trutek Corp.'s Complaint asserted against them. In support thereof, the moving Defendants rely upon Ex. A annexed hereto and incorporate by reference their memorandum in support submitted contemporaneously herewith.

PLEASE TAKE FURTHER NOTICE that the moving Defendants request the matter be decided on the papers.

Pursuant to Local Civ. Rule 7.1(e), a copy of the proposed Order is annexed hereto.

The moving Defendants filed individual motions on October 2, 2023. Pursuant to the Court's October 5, 2023 Text Order, the moving Defendants hereby submit this consolidated motion. The moving Defendants respectfully request their consolidated memorandum supporting their consolidated motion be excused from the 30-page limit under Local Civ. Rule 7.2(d).

Dated: October 25, 2023

LADDEY, CLARK & RYAN, LLP

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that, on this day, the foregoing document was served via email to all counsel of record pursuant to the Court's October 4, 2023 Text Order.

Dated: October 25, 2023 Respectfully submitted,

LADDEY, CLARK & RYAN, LLP

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